

**RUSSELL LOW, ESQ. RLL-4745**

**LOW & LOW, LLC.**

**Attorneys at Law**

**505 Main Street**

**Hackensack, NJ 07601**

**(201) 343-4040**

**Attorney for Debtor**

---

**IN THE UNITED STATES BANKRUPTCY COURT  
FOR THE DISTRICT OF NEW JERSEY**

**IN RE: : CHAPTER 13**

**Randell A. Soto, Jr. : CASE NO. 23-19707**

**Debtor : HONORABLE Vincent F. Papalia**

---

**ATTORNEY'S RESPONSE TO CHAPTER 13 TRUSTEE'S CERTIFICATION IN  
SUPPORT OF DEFAULT**

---

I, Russell L. Low, Esq. hereby certify the following:

1. Freedom Mortgage filed a Motion for Relief from Auto on June 4, 2025, due to the debtor being delinquent.
2. As of today, July 29, 2025, I have been unable to reach the debtor to file a timely opposition.
3. Therefore, I am respectfully requesting the opportunity to reach the debtor before the hearing date and hopefully resolve this matter.

I hereby certify that the foregoing statements made by me are true and correct to the best of my knowledge.

Date: July 10 2025

/s/ Russell L. Low

**Russell L. Low**

Attorney for Debtor